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* To apply for admission *pro hac vice*.

Attorneys for Plaintiff and Potential Opt-in Plaintiffs

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

WILL TOOMEY, Individually and On Behalf of
Others Similarly Situated,

Plaintiffs,

vs.

COLD BORE TECHNOLOGY CORP.,

Defendant.

Case No. 2:24-cv-01579-MDC

**PLAINTIFF'S REQUEST FOR
EXTENSION OF TIME TO FILE PRO
HAC VICE APPLICATION FOR
MICHAEL A. JOSEPHSON**

On August 26, 2024, Will Toomey filed this Collective Action Complaint seeking unpaid overtime wages on behalf of himself and others similarly situated. See ECF No. 1. On August 27, 2024, the Court issued a Notice pursuant to Local Rule IA 11-2 to Andrew W. Dunlap, Michael A. Josephson, and Richard J. (Rex) Burch to file their applications for admission pro hac vice by September 10, 2024. See ECF No. 4. Mr. Dunlap timely applied for admission pro hac vice. See ECF No. 8. Mr. Burch timely applied for admission pro hac vice. See ECF No. 10. Mr. Josephson's application is all but ready for filing, but counsel is awaiting a certificate of good standing to be

1 furnished from Pennsylvania. In anticipation of filing the application for pro hac vice admission, Mr.
2 Josephson's office ordered a certificate of good standing from the Pennsylvania State Bar via the US
3 Postal Mail and the certificate of good standing will be issued to Mr. Josephson via US Postal Mail.

4 Out of abundance of caution, Plaintiff respectfully requests an additional 56 days to submit
5 Mr. Josephson's application for admission pro hac vice to obtain a certificate of good standing from
6 the State Bar of Pennsylvania.
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8 Date: September 9, 2024

Respectfully Submitted,

11 **ORDER**

12 IT IS SO ORDERED.

13 Dated: 9/18/2024

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Hon. Maximiliano D. Couvillier III
United States Magistrate Judge

/s/ Esther C. Rodriguez

Esther C. Rodriguez (Bar No. 006473)

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Counsel for Toomey and the Day Rate Workers

CERTIFICATE OF SERVICE

I hereby certify that on September 9, 2024, I electronically filed the foregoing document with the Clerk of Court using the Court's CM/ECF system, which will send a notice of electronic filing to all CM/ECF participants.

In the event the foregoing document is filed prior to Defendant making an appearance in this Action, I hereby certify that a true and correct copy off the foregoing document and all attachments thereto will be duly served on Defendant along with the summons and Complaint in accordance with Federal Rule of Civil Procedure 5.

/s/ Esther C. Rodriguez
Esther C. Rodriguez